REMARKS

The Examiner is thanked for the thorough examination of the present application. The Office Action, however, tentatively rejected all claims 1-36. In response, Applicant submits the foregoing amendments and the following remarks. In the foregoing amendments, all independent claims (1, 10, 19, and 28) have been amended, thereby rendering the various rejections moot. Notwithstanding, Applicant submits the following distinguishing remarks. For at least the reasons set forth herein, Applicant submits that the rejections should be reconsidered and withdrawn. Applicant submits that no new matter is added by these amendments.

Rejections under 35 U.S.C 103(a)

Claims 1-36 stand rejected under 35 U.S.C 103(a) as allegedly being unpatentable over Yang et al (2003/0233290) in view of Wang et al (2005/0038684). Applicant respectfully request reconsideration and withdrawal of these rejections for at least the following reasons.

In regard to independent claims 1, 10, 19 and 28, each of these claims have been rejected on the same basis. Therefore, Applicant will focus on the rejection of claim 1. Claim 1 recites:

> 1. A system of order fulfillment, comprising:
> a pre-picking unit ***picking an order corresponding to a product and at least a first lot corresponding to the product having WIP (Work In Process) status to generate a pre-picked invoice*** including the order and the first lot, ***wherein the first lot having WIP status representing the first lot is currently manufactured***; and
> a matching engine to determine whether the first lot has achieved F/G (Finished Goods) status at a first shipping time, and, if so,

to ***generate a first real invoice corresponding to the pre-picked invoice for the order and the first lot.***

(*Emphasis added*). Claim 1 patently defines over the cited art for at least the reasons that the cited art fails to disclose the features emphasized above.

The Office Action alleged that the Yang reference discloses a matching engine to *determine whether the first lot has achieved F/G status at a first shipping time,* and if so, to generate a first real invoice. Paragraph [0018] of the Yang reference, however, states: "The supply chain management system is able to provide lot tracking reports, actual cost lot detail reports, wafer rolling output reports, finished goods rolling output reports, work in progress inventory reports and other reports useful for supply chain management." Paragraph [0020] of the Yang reference states: "In the semiconductor manufacturing industry in order to procure finished goods (for example a finished semiconductor chip), a buyer first orders wafers from a Fab supplier (foundry); once the work at the Fab supplier is finished, the buyer orders sorting from a Wafer Sort supplier; after the Wafer Sort work is finished, the buyer orders Assembly from an Assembly supplier; and finally, the buyer orders Final Test from a Final Test supplier. The supply chain management system is able to perform group order generation for groups of dependent suppliers (such as Fab, Wafer Sort, Assembly and Final Test suppliers) in the supply chain".

It is, therefore, clear that, paragraph [0018] of the Yang reference only relevantly discloses that *a system can generate various reports useful for supply chain management.* And, paragraph [0020] of the Yang reference only relevantly describes *the general procedure of a supply chain, and says a system can perform order generation.* Additionally, Fig. 22 and its description in paragraph [0176] of Yang only relevantly discloses *an example of finish good rolling output report mapped to buyers and suppliers.*

Nowhere in the Yang reference does it disclose the claimed feature of ***determination of whether the first lot has achieved F/G status at a first shipping time,*** **and the generation of a first real invoice if *the first lot has achieved F/G status*.** It is also noted that, ***nowhere in the Yang reference does it disclose or suggest the invoice problem.*** For at least these reasons, the rejection of claim 1 should be withdrawn.

In addition, the Office Action asserts that Wang discloses *picking an order corresponding to a product and at least a first lot corresponding to the product to generate a pre-picked invoice including the order and the first lot.* Paragraph [0042] of the Wang reference states: "...the order management module 122 receives the purchase order 113 for the product from the customer 111, and arranges capacity to meet customer demand. It should be noted that the received demand plan 112 and the purchase order 113 should be stored in databases..." In the supply chain management, the supplier receives demands from clients and plans its capacity accordingly. When actual orders are received from the client, the reserved capacity for the client is consumed to manufacture products.

It is, therefore, clear that paragraph [0042] of the Wang reference only relevantly discloses ***the general capacity manage procedure***. Additionally, paragraph [0048] of the Wang reference also discloses the capacity management in Wang's manner. Nowhere in the Wang reference does it disclose the claimed feature of *picking an* ***order*** *and at least* ***a first lot currently manufactured*** *to generate a pre-picked invoice.* Additionally, paragraph [0052] of the Wang reference only relevantly discloses that the warehouse/delivery unit 126 may perform automatic pick, pre-pick, and other functions to allow the customer to change the specified location and factory before the products are transferred. No more details of the "pre-pick" feature is discussed in the Wang reference.

In the present application, orders and corresponding WIPs can be pre-picked in advance, and the real invoices automatically generated when the picked WIPs become finished goods. Applicant submits that these claimed features are not disclosed anywhere in either the Yang or Wang references. Therefore, even if the two references could be properly combined, the resulting combination fails to disclose the claimed combination of features.

For at least these reasons, the rejection of claim 1 should be withdrawn. As independent claims 10, 19, and 28 were rejected on the same basis as claim 1, the rejections of these claims should be withdrawn for the same reasons. Insofar as all remaining claims depend from either claim 1, claim 10, claim 19, or claim 28, all rejections should be withdrawn for the same reasons. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

For at least the foregoing reasons, it is believed that all pending claims are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

No fee is believed to be due in connection with this submission. If, however, any fee is deemed to be payable, you are hereby authorized to charge any such fee to Deposit Account No. 20-0778.

Respectfully submitted,

/Daniel R. McClure/

By: _____

Daniel R. McClure, Reg. No. 38,962

THOMAS, KAYDEN, HORSTEMEYER & RISLEY, L.L.P.
600 Galleria Parkway, SE
Suite 1500
Atlanta, Georgia 30339-5948
(770) 933-9500